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November 16, 2023

Hon. Charles R. Breyer
USDC Northern Dist. of California
450 Golden Gate Avenue
San Francisco, CA 94102

**Re: *In re: Uber Technologies, Passenger Sexual Assault Litigation*
MDL No. 3084 CRB**

Your Honor:

Pursuant to Pre-Trial Order No. 3, I submit this application to serve on the Plaintiff's Steering Committee.

I have practiced in California and this District for over two decades, with a particular focus on jury trials. My trial experience ranges from product liability claims, to civil rights and general personal injury matters.

The table below contains the names and contact details of the judges before whom I've appeared in MDL or coordinated proceedings:

Case Title	Judge(s)
<i>In Re Paraquat Litigation</i> MDL Case No. 3:21-md-03004-NJR	The Honorable Nancy J. Rosenstengel USDC Southern Dist. of Illinois 750 Missouri Avenue East St. Louis, IL 62201 (618) 482-9342
<i>Paraquat Cases</i> Cal. JCCP No. 5031	The Honorable Charles S. Treat Contra Costa Superior Court, Dept 12 725 Court Street Martinez, CA (925) 608-1112

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<i>In re: JUUL Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation</i> MDL Case No. 3:19-md-02913-WHO	The Honorable William H. Orrick USDC Northern Dist. of California 450 Golden Gate Avenue San Francisco, CA 94102 (415) 522-2077
<i>In re California North Bay Fire Cases</i> Cal. JCCP No. 4955	The Honorable Andrew Cheng San Francisco Superior Court, Dept. 613 400 McAllister Street San Francisco, CA 94102 (415) 551-3849 The Honorable Teri Jackson San Francisco Superior Court, Dept. 603 San Francisco, CA 94102 (415) 551-3732
<i>In Re Yosemite National Park Hantavirus Litigation</i> MDL Case No. 3:14-md-02532-MMC	The Honorable Maxine Chesney USDC Northern Dist. of California 450 Golden Gate Avenue San Francisco, CA 94102 (415) 522-2041
<i>In Re DePuy Orthopaedics, Inc., Pinnacle Hip Products Liability Litigation</i> MDL Case No. 3:11-md-02244-K	The Honorable Ed Kinkeade USDC Northern Dist. of California 1100 Commerce Street, Room 1625 Dallas, TX 75242-1003 (214) 753-2720
<i>In Re Mentor Corp. Obtape Transobturator Sling Products Liability Litigation</i> MDL Case No. 4:08-md-2004-CDL	The Honorable Clay D. Land USDC Middle Dist. of Georgia 120 12th Street Columbus, GA 31902 (706) 649-7812

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My firm has specific experience in prosecuting cases against Uber given our work in the *Doe v. Uber Technologies* matter (Case No. 3:19-cv-03310-JSC), which is currently under submission in the Ninth Circuit.

Over the years I've had the pleasure to serve as an adjunct faculty member teaching trial advocacy at UC Berkeley Law School. I've also taught Moot Court at UC College of Law San Francisco (fka Hastings).

I am willing and able to immediately commit whatever time is necessary to do this job. I also work cooperatively with other members of the bar, be they plaintiff or defense counsel. My goal in any case is to be a member of a collaborative team, and to spare no effort to maintain credibility.

Since this MDL was established, the individuals listed on Exhibit A, attached, have been collaborating, and working cohesively, on procedural and substantive issues to prepare to move these cases forward. I support, and enjoy the support of, the additional applicants on this list for a leadership role on behalf of the plaintiffs in this litigation.

My most recent prior MDL experience stems from my service as one of the two liaisons in the JUUL MDL Proceedings with Judge Orrick. The JUUL leadership is among the most inclusive collection of lawyers I've encountered. One reason for that success is that leadership always focused on the merit of the idea, as opposed to the proponent. I hope to bring a similar dynamic to this case if given with the opportunity to do so. I've attached a copy of my CV as Exhibit B.

My firm has the resources to prosecute these cases expeditiously. I thank the Court for considering my submission, and I would be truly privileged to assist in this important case.

Very truly yours,



KHALDOUN A. BAGHDADI

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Attachments